

UNITED STATES DISTRICT COURT		SOUTHERN DISTRICT OF TEXAS	
JEFFREY BROWN,		HOUSTON DIVISION	
<i>versus</i>		CIVIL ACTION No. H-4:22-cv-04059	
VALVOLINE, LLC AND FRANK HARRIS		DEFENDANTS' WITNESS LIST	
LIST OF: DEFENDANTS' WITNESS LIST TYPE OF HEARING: JURY TRIAL		COUNSEL: JEREMY W. HAWPE	
JUDGE: ANDREW S. HANEN	CLERK: RHONDA HAWKINS	REPORTER:	
No.	NAME OF WITNESS		
1.	<p>Jeffrey Brown c/o Lewis A. Zipkin and Kevin M. Gross The Zipkin Whiting Bldg. 3637 South Green Road Beachwood, OH 44122</p> <p>Mr. Brown is the Plaintiff in this case and presumably has knowledge of the basis for his claims against Defendant, including the facts and circumstances surrounding his allegations, his employment with Defendant, his earnings during and after his employment, and his alleged damages.</p>		
2.	<p>Dalan Motz c/o Jeremy W. Hawpe Littler Mendelson, P.C. 2001 Ross Avenue, Suite 1500, Lock Box 116 Dallas, Texas 75201</p> <p>Mr. Motz is expected to testify regarding his knowledge of Plaintiff's employment with Defendant, his own interactions and communications with Plaintiff, Plaintiff's complaint against him, Valvoline's applicable employment policies and procedures, and of the legitimate, non-discriminatory, and non-retaliatory reasons for any employment actions taken regarding Plaintiff.</p>		
3.	<p>Frank Harris c/o Jeremy W. Hawpe Littler Mendelson, P.C. 2001 Ross Avenue Suite 1500, Lock Box 116 Dallas, Texas 75201</p> <p>Mr. Harris is expected to testify regarding his knowledge of Plaintiff's employment with Defendant, his own interactions and communications with Plaintiff, Valvoline's applicable employment policies and procedures, and of the legitimate, non-discriminatory, and non-retaliatory reasons for any employment actions taken regarding Plaintiff.</p>		

4.	<p>Mindy Sahli c/o Jeremy W. Hawpe Littler Mendelson, P.C. 2001 Ross Avenue Suite 1500, Lock Box 116 Dallas, Texas 75201</p> <p>Ms. Sahli may testify regarding her knowledge of Plaintiff's employment with Defendant, her communications with Plaintiff, and Valvoline's applicable employment policies and procedures.</p>
5.	<p>Kevin Meyers c/o Jeremy W. Hawpe Littler Mendelson, P.C. 2001 Ross Avenue Suite 1500, Lock Box 116 Dallas, Texas 75201</p> <p>Mr. Meyers may testify regarding his knowledge of Plaintiff's employment with Defendant, Valvoline's applicable employment policies and procedures, and of the legitimate, non-discriminatory, and non-retaliatory reasons for any employment actions taken regarding Plaintiff.</p>
6.	<p>Robert Shelton c/o Jeremy W. Hawpe Littler Mendelson, P.C. 2001 Ross Avenue Suite 1500, Lock Box 116 Dallas, Texas 75201</p> <p>Mr. Shelton may testify regarding his knowledge of Plaintiff's employment with Defendant, Valvoline's applicable employment policies and procedures, and of the legitimate, non-discriminatory, and non-retaliatory reasons for any employment actions taken regarding Plaintiff.</p>
7.	<p>Trish Thompson c/o Jeremy W. Hawpe Littler Mendelson, P.C. 2001 Ross Avenue Suite 1500, Lock Box 116 Dallas, Texas 75201</p> <p>Ms. Thompson may testify regarding her knowledge of Plaintiff's leave, her communications with Plaintiff, and Valvoline's applicable employment and leave policies and procedures.</p>

8.	<p>Regina Green c/o Jeremy W. Hawpe Littler Mendelson, P.C. 2001 Ross Avenue Suite 1500, Lock Box 116 Dallas, Texas 75201</p> <p>Ms. Green may testify regarding her knowledge of Plaintiff's employment with Valvoline, Valvoline's investigation into Plaintiff's complaint, and Valvoline's applicable employment policies and procedures.</p>
9.	<p>Cindi McCloskey c/o Jeremy W. Hawpe Littler Mendelson, P.C. 2001 Ross Avenue Suite 1500, Lock Box 116 Dallas, Texas 75201</p> <p>Ms. McCloskey may testify regarding her knowledge of Plaintiff's employment with Valvoline, her communications with Plaintiff, Valvoline's investigation into Plaintiff's complaint, and Valvoline's applicable employment policies and procedures.</p>
10.	Custodians of record for the Plaintiff's previous and subsequent employers.